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CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY _____

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SHANA LEE MCCART-POLLAK,)	Case No. 2:17-cv-00042-RFB-CWH
)	
Plaintiff,)	
vs.)	
)	
EDWARD ETKIN, an individual; LAW)	
OFFICES OF EDWARD ETKIN, ESQ. PC)	
a New York business entity; DOES I)	
Through X; ROE BUSINESS ENTITIES)	
I through X, inclusive,)	
)	
Defendants.)	

STIPULATION AND PROPOSED ORDER
RE: JOINT PRETRIAL ORDER DUE DATE (ECF NO. 69)

Plaintiff Shana Lee McCart-Pollak, in pro per, and Defendants Edward Etkin and the Law Offices of Edward Etkin, Esq. PC, by and through their undersigned counsel, hereby submit the following proposed amendment to the Amended Scheduling Order previously entered by this Court (ECF No. 69).

The Amended Scheduling Order states as follows:

6. Pretrial Order [LR II 26-1(b)(5)]:

The Joint Pretrial Order shall be filed 30 days after the Court files its decision on Defendants' Motion for Summary Judgment (ECF No. 55), together with any supplement thereto. All motions in limine shall be submitted with the Pretrial Order.

1 7. **Fed.R.Civ.P. 26(a)(3) disclosures [LR II 26-1(b)(6)]:**

2 The disclosures required by Fed.R.Civ.P. 26(a)(3) and any objections
3 thereto shall be included in the Joint Pretrial Order.

4 (ECF No. 69, Amended Scheduling Order.) During the September 21, 2018 hearing regarding
5 Defendants' Motion for Summary Judgment, the Court also stated that the Joint Pretrial Order
6 would be due in 30 days. (ECF No. 87, at 27:13-20.) The first court day following the expiration
7 of that 30-day period is Monday, October 22, 2018.

8 Following the September 21, 2018 hearing Plaintiff diligently pursued obtaining a copy
9 of her invoices from the Holland & Hart law firm so that she could redact and produce them as
10 discussed during the hearing. The person in the Holland & Hart accounting department with
11 whom she was communicated was out of the office for a period of time, and thus Plaintiff was
12 not able to obtain and produce those records until October 9, 2018. In the meanwhile, Plaintiff
13 and Defendants were engaged in active settlement discussions which commenced after the
14 September 21, 2018 hearing, which continued through the week of October 7 – 12, 2018. The
15 parties were reluctant to embark on the expensive process of drafting the Joint Pretrial Order
16 while attempting to resolve the case.

17 For these reasons, the parties respectfully jointly request that the Court extend the due
18 date for the submission of the Joint Pretrial Order (which will include all Rule 26(a)(3)
19 disclosures), and any motions in limine, to **Friday, November 9, 2018**, an extension of less than
20 three weeks from the present due date.

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1 WHEREFORE, Plaintiff and Defendants stipulate and request that the Court amend the
2 Amended Scheduling Order (ECF No. 69) as set forth above.

3 DATED this 15th day of October, 2018.

DATED this 15th day of October, 2018.

4 LAXALT & NOMURA, LTD.

5 /s/ Daniel T. Hayward

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Plaintiff in Pro Per

13 **ORDER**

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15 IT IS SO ORDERED.

16
17 
18 UNITED STATES MAGISTRATE JUDGE

19 DATED October 18, 2018
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CERTIFICATE OF SERVICE

Case Name: McCart-Pollak v Etkin et al

District Court Case No: 02:17-cv-00042-RFB-CWH

I, **Shana Lee McCart-Pollak**, declare as follows. I am over the age of 18 years:

My address is: 524 Blanche Court
Henderson, Nevada 89052
(702) 439-2263

On **October 16, 2018**, I served the foregoing document described as:

**STIPULATION AND PROPOSED ORDER RE; JOINT PRETRIAL ORDER DUE
DATE (ECF NO. 69)**

By placing a true and correct copy thereof in a sealed envelope, with postage, and deposited said envelope in the United States mail in Henderson, Nevada addressed to:

Laxalt and Nomura, LTD
9790 Gateway Drive, Suite 200
Reno, NV 89521
Attn: Dan Hayward

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 16, 2018 at Henderson, NV
(date) (place of signing)

Shana Lee McCart-Pollak
Signature

Shana Lee McCart-Pollak
name